EXHIBIT I

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August 22, 2012

Ms. Carrie L. Geyer, P.E.
Budget Tracking and Site Management Unit
Superfund Section
Remediation Division
Michigan Department of Environmental Quality
525 West Allegan Street
Lansing, Michigan 48909-7973

Re: Revised Plan for Additional Response Activities at Sturgis Municipal Well Field Superfund Site, Sturgis, Michigan

Dear Ms. Geyer:

URS Corporation (URS) is pleased to submit to the Michigan Department of Environmental Quality (MDEQ), on behalf of Newell Rubbermaid Inc. (Newell), this revised Plan for Additional Response Activities (the revised Plan) in the source area at the former Kirsch Plant No.1 (Kirsch source area) located in the Sturgis Municipal Well Field Superfund site in Sturgis, Michigan. According to the Pre-Design Investigation Report[1], the vadose zone soil on the east and west parcels of the Kirsch source area is impacted with trichloroethylene (TCE) and/or tetrachloroethylene (PCE) above soil cleanup criteria for protection of groundwater. The cleanup criteria for TCE and PCE are specified in the Record of Decision (ROD) Amendment dated September 10, 1996 as 100 ug/Kg. The main purpose of this revised Plan is to provide a scope of work and schedule to implement soil remediation in the vadose zone of the Kirsch source area to address these soil impacts.

This revised Plan has been developed in response to the MDEQ's Notice of Additional Response Activities dated April 14, 2011 (received by Newell on April 27, 2011), and the following communications with MDEQ:

1. MDEQ's Response to Plan for Additional Response Activities dated August 17, 2011 (received via electronic mail)
2. Meeting with MDEQ in Lansing, Michigan on December 2, 2011
3. MDEQ's Comments on the Site Lithology within the Kirsch Source Area dated June 11, 2012 (received via electronic mail)
4. MDEQ's Response to Revised Plan for Additional Response Activities dated July 27, 2012 (received via electronic mail)

This revised Plan consists of the following tasks:

1. Secure access to the site
2. Conduct leachate study on Kirsch source area soil
3. Prepare engineering design and bid specification documents
4. Excavate soil and install vadose zone remediation system
5. Operate and maintain vadose zone remediation system
6. Implement post-remediation confirmation sampling work plan

[1] URS, Pre-Design Investigation Report, Former Kirsch Plant No.1 Source Area, Sturgis Municipal Well Field Superfund Site, Sturgis, Michigan, December 2, 2010.

The following section describes the proposed scope of work and schedule for each task to be performed.

SCOPE OF WORK AND SCHEDULE

Task 1 – Secure Access to the Site

Newell is prepared to request access to the west parcel from its property owner to conduct leach tests following MDEQ approval of the Plan. No access request is needed for the east parcel to conduct the leach tests. Following MDEQ approval of the 95% design document (Task 3), Newell will enter into negotiations with the property owners of the west and east parcels of the Kirsch source area to secure an access agreement to conduct remediation work.

Task 2 – Conduct a Leachate Study on Kirsch Source Area Soil

The objective of this task is to develop alternate soil cleanup criteria for protection of groundwater (for TCE and PCE) by performing soil leach testing on different soil types that are encountered in the west and east parcels of the Kirsch source area. Based on the soil-specific leach testing, different soil cleanup criteria may be developed for each soil type, provided these values are greater than the generic soil cleanup criteria established for TCE and PCE (100 ug/Kg). This approach (described below) is in compliance with R 299.5722, Rule 722 of the Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

To conduct this testing, a statistically significant number of soil samples (minimum of nine) will be required from each soil type in the west and east parcels of the Kirsch source area. Since outliers (samples with high and low TCE and PCE concentrations) will be excluded from this analysis, approximately 15 soil samples will be collected from each soil type. The following are the two soil types that are being considered for the Kirsch source:

1. Fill material, which occurs at the site between ground surface and approximately 6 feet below grade.
2. Sandy soil, which is the predominant soil type at the site.

Within each soil type, the collected soil samples will be subjected to the following analysis:

1. A detailed description of each soil sample will be provided along with identification of observed organic matter, if any, photographs and any other relevant information associated with the sample. Approximately 20% of the soil samples will be tested for soil particle size and distribution.
2. Each soil sample will be analyzed in the laboratory for TCE and PCE as key constituents of concern, and synthetic precipitation leaching procedure (SPLP) for TCE and PCE. When the sample is very heterogeneous or unique, a duplicate sample will be collected.
3. The results for each soil sample would include TCE and PCE concentrations in soil as well as TCE and PCE leachate concentrations.
4. When analysis of all samples is complete, the TCE and PCE concentration in soil and the TCE and PCE concentration in the leachate will be tabulated. Outliers (high and low values) in the data set will be identified using various statistical methods and removed from consideration.

5. After the outliers are removed from the data set, a 95% upper confidence limit (UCL) of the arithmetic mean (95% UCL) will be determined for the soil TCE concentration and the leachate TCE concentration. Similarly, a 95% UCL will be determined for the soil PCE concentration and leachate PCE concentration.
6. The ratio of the soil 95% UCL TCE concentration to the 95% UCL leachate TCE concentration will be determined. Similarly, the ratio of the soil 95% UCL PCE concentration to the 95% UCL leachate PCE concentration will be determined.
7. The new soil cleanup criteria for TCE and PCE will be calculated by multiplying the corresponding ratio by the generic groundwater cleanup criteria for TCE and PCE (5 ug/L).

In this manner described above, new cleanup criteria for TCE and PCE will be developed for each of the two types of soil encountered within the Kirsch source area.

A work plan detailing sample locations, laboratory analysis, and data presentation will be submitted to MDEQ for approval prior to commencement of work. This work plan will elaborate on the location and depth for collection of soil samples, and also will discuss the interpretation of the leach testing data. Task 2 will start concurrently with Task 1. At the conclusion of this task, a report will be submitted to MDEQ providing specifics on the sampling methodology, laboratory analysis and data evaluation, and presenting conclusions of this study. If the results of the leachate study are favorable (greater than the generic soil cleanup criteria) for any soil type, a request will be made to MDEQ and United States Environmental Agency (USEPA) to modify the soil cleanup criteria for that particular soil type.

The major subtasks and their schedule are provided below.

Subtask	Due Date
1. Submit leachate study work plan to MDEQ	60 days after MDEQ approval of the Plan
2. Initiate field work	30 days after MDEQ approval of work plan
3. Submit leachate study report to MDEQ	60 days after completion of field work

Task 3 – Prepare Engineering Design and Bid Specification Documents

The objective of the remediation effort is to reduce TCE and PCE impacts within the Kirsch source area to below the generic soil cleanup criteria of 100 ug/Kg, or a newly developed soil cleanup criteria, as determined from Task 2. This task involves the preparation of 95% and 100% engineering design documents for excavation and disposal of impacted surface soil (0 to 2 feet), and for the installation of a soil vapor extraction (SVE)-air sparge remediation system in the vadose zone of the Kirsch source area. The engineering design documents will include a post-remediation confirmation soil sampling work plan to verify if soil cleanup objectives have been achieved in the Kirsch source area. Task 3 also includes developing a bid specification document to procure subcontractor bids for excavation and installation of the remediation system. It should be noted that the engineering design for excavation of impacted surface soil and for the installation of a SVE-air sparge remediation system is very much dependent on the results of the leachate study and the determination of the soil cleanup criteria.

The major subtasks and their schedule are provided below.

Subtask	Due Date
1. Submit 95% design document for west and east parcels (including a post-remediation confirmation soil sampling plan) to MDEQ	120 days after MDEQ approval of the leachate study report, if the results are unfavorable, or 120 days after USEPA responds to the request to modify the soil cleanup criteria, if the results are favorable
2. Submit 100% design document for west and east parcels to MDEQ	60 days after MDEQ comments on 95% design document
3. Submit bid specification document to MDEQ	45 days after MDEQ approval of 100% design document
4. Issue bid specification document to subcontractors	45 days after MDEQ approval of bid specification document
5. Award contract	30 day after issuing bid specification document to prospective bidders

Task 4 – Excavate Soil and Install Vadose Zone Remediation System

This task involves the excavation and disposal of impacted surface soil (0 to 2 feet), and the installation of a SVE-air sparge remediation system in the vadose zone of the Kirsch source area. The remediation will be performed in a staged approach, starting with surface soil excavation and installation of a SVE-air sparge remediation system in the west parcel. Two years later, surface soil excavation and installation of the SVE-air sparge remediation system in the east parcel will be initiated. The excavation and installation of a SVE-air sparge remediation system in the west and east parcels will be performed by the same subcontractor.

The major subtasks and their schedule are provided below.

Subtask	Due Date
1. Complete surface soil excavation and installation of SVE- air sparge system on west parcel	150 days after awarding contract
2. Submit construction completion report for west parcel to MDEQ	60 days after completion of excavation and SVE- air sparge system installation on west parcel
3. Start surface soil excavation and installation of SVE- air sparge system on east parcel	730 days after completion of SVE- air sparge system installation on west parcel

4.	Complete surface soil excavation and installation of SVE- air sparge system on east parcel	140 days after starting excavation and installation of SVE- air sparge system on east parcel
5.	Submit construction completion report for east parcel to MDEQ	60 days after completion of excavation and SVE- air sparge system installation on east parcel

Task 5 – Operate and Maintain Vadose Zone Remediation System

This task involves the development of an operation, maintenance and monitoring plan to operate, maintain and monitor the SVE-air sparge remediation system on the west and east parcels of the Kirsch source area. This task also includes the collection of vapor samples from the SVE wells at a frequency of four times per year. Each remediation system is expected to operate for approximately 4 years with a 2 year overlap.

The major subtasks and their schedule are provided below.

	Subtask	**Due Date**
1.	Submit operation, maintenance and monitoring plan for west and east parcels to MDEQ	15 days after completion of SVE- air sparge system installation on west parcel
2.	Submit operation progress report for west and east parcels to MDEQ	30 days after each round of vapor sampling

Task 6 – Implement Post-Remediation Confirmation Sampling Work Plan

This task involves implementation of the post-remediation confirmation soil sampling work plan for the west and east parcels of the Kirsch source area to assess effectiveness of the remediation system in meeting soil cleanup criteria.

The major subtasks and their schedule are provided below.

	Subtask	**Due Date**
1.	Initiate confirmation sampling field work in west parcel	30 days after shut down of SVE- air sparge system on west parcel
2	Submit confirmation sampling report for west parcel to MDEQ	60 days after completion of field work in west parcel
3.	Initiate confirmation sampling field work in east parcel	30 days after shut down of SVE- air sparge system on east parcel
4.	Submit confirmation sampling report for east parcel to MDEQ	60 days after completion of field work in east parcel

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Please note that once this revised Plan has been approved by MDEQ, URS will submit monthly progress reports to MDEQ on the status of the above tasks. If you have any further questions or comments, please do not hesitate to contact me at 312-577-7409 or Kristin Jones of Newell at 770-418-7822.

Sincerely,

URS Corporation

David Meiri

David Meiri, Ph.D., CGWP
Vice President

cc: Ms. Kristin Jones, Newell
Mr. Robert Franks, MDEQ
Mr. Charles Graff, MDEQ
Dr. Eric Wildfang, MDEQ
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